

**IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF DELAWARE**

THOMAS A. EAMES, ROBERTA L. EAMES)	
and TAMMY EAMES, on behalf of)	
themselves and all others)	
similarly situated,)	
)	
Plaintiffs.)	C.A. No. 04-CV-1324KAJ
)	
v.)	
)	
NATIONWIDE MUTUAL INSURANCE)	
COMPANY,)	
)	
Defendant.)	

**APPENDIX: MATTERS FOR EXAMINATION AND DOCUMENTS TO BE
PRODUCED UNDER FEDERAL RULES OF CIVIL PROCEDURE 30(b)(6) AND 45**

Definitions

1. References to "you" and "your" are to Lisa Broadbent Insurance, Inc.
2. The term "PIP" refers to Personal Injury Protection provided, pursuant to 21 Del C. §2118, under any policy of automobile insurance issued by defendant Nationwide Mutual Insurance Company since August 20, 2001.
3. The term "document" shall have the broadest meaning permissible under the Federal Rules of Civil Procedure, and shall include (without limitation) documents created or stored by electronic means.

Documents to be Produced

1. All documents that refer to or characterize limits of liability for PIP coverage as "full."
2. All documents that refer or relate to the characterization of limits of liability for PIP coverage as "full."

Matters for Examination

1. The existence *vel non*, location and organization of any documents responsive to the subpoena *duces tecum* to which this Appendix attaches.
2. The identity of any custodian for documents responsive to the subpoena *duces tecum* to which this Appendix attaches.
3. The circumstances surrounding your characterization of limits of liability for PIP coverage as "full."

Respectfully submitted,

MURPHY SPADARO & LANDON

/s/ John S. Spadaro _____

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Attorneys for plaintiffs Thomas A. Eames,
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behalf of themselves and all others similarly
situated)

March 24, 2005

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NOTICE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following:

Nicholas E. Skiles, Esq.
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